

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Agrielectric Power Partners, Ltd	AI #:	7835	TEMPO Activity No:	PER20090001
Facility Name:	Plant No. 1	Remarks	Submitted by: Erin R. Colborn, E.I. (GEC, Inc.)		
Permit Writer:	Shannon Pusateri	Permit Writer Email address:	Shannon.Pusateri@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – DO NOT COMPLETE THIS SECTION. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Cover/signature page	References contained in the text of the cover/signature page imply that this is a new facility (e.g. “This permit is both a state preconstruction and Part 70 Operating Permit”; “...if emissions are exceeded after operations begin”). This permit renewal is for an existing facility. At the bottom of the cover/signature page, the proposed permit number is stated as 0520-00101-V0. This is actually the facility’s existing permit number, and should be changed to 0520-00101-V1.	The cover page will be modified as follows to address these concerns: The second sentence of the first paragraph of the signature page will read: “The permit is a renewal of the Part 70 Operating Permit.” The fourth sentence of the first paragraph of the signature page will read: “A new application must be submitted if the reported emissions exceed the permitted emissions.” The permit number has been changed to reflect the correct version number. The change will be made.
Statement of Basis, page 1 (Heading)	In the heading for the statement of basis, the proposed permit number is stated as 0520-00101-V0. This is actually the facility’s existing permit number, and should be changed to 0520-00101-V1.	

Statement of Basis, page 1 (Section II)	The second sentence should be changed to "Flue gas from the 12 MW power <u>boiler</u> is the primary source...". The fourth sentence should be changed to "... five dust collectors <u>equipped with</u> bag filters.".	The changes will be made.
Statement of Basis, page 1 (Section III)	The first sentence of the "Application" paragraph should be changed to "...requesting <u>renewal of the</u> Part 70 operating permit for Plant No. 1.". The first sentence of the "Project" paragraph should be changed to "...and a small <u>gas-fired</u> jockey boiler...".	The changes will be made.
Statement of Basis, page 2 (Section IV)	The last sentence of this paragraph is incomplete; text appears to have been omitted.	The paragraph has been changed to incorporate the deleted language.
Statement of Basis, page 4 (Section IV)	Suggest rewording of the first sentence of this Periodic Monitoring section (which should be renumbered to Section V) to "...every five years to verify emission rates of <u>nitrogen oxides, carbon monoxide, and sulfur dioxide</u> ", as emission testing is not required to verify emission rates of all criteria pollutants.	The changes will be made.
Air Permit Briefing Sheet, page 1 (Section III)	<p>First paragraph: The third sentence should be changed to "Flue gas from the 12 MW power <u>boiler</u> is the primary source...". The fifth sentence should be changed to "... five dust collectors <u>equipped with</u> bag filters."</p> <p>Second paragraph: This sentence should be changed to "...and a small <u>gas-fired</u> jockey boiler...".</p>	<p>The changes will be made.</p> <p>The changes will be made.</p>
Air Permit Briefing Sheet, page 3 (Section IX)	The volume of the caustic soda tank in the list of Insignificant Activities should be corrected to 1,550 gallons (only stores up to 500 gallons at any given time).	The change will be made.
General Information Sheet	<ul style="list-style-type: none"> ○ The primary phone number for the plant should be changed to (337) 430-0006. The phone number for Carl Kissner should be changed to (337) 421-6330. The phone number for James Warshaw should be changed to (337) 421-6303. ○ The mailing address for James Warshaw should be changed to P.O. Box 3716, Lake Charles, LA 70602. 	The changes will be made.
Inventories (Subject Item Inventory Table)	<p>These suggested changes are being also being sent to Ms. Tommie Milam's attention (LDEQ), as instructed in the footnotes of the General Information Sheet.</p> <p>The maximum operating rate of the 12 MW Boiler No. 1 (I-84) is identified as 220 MMBTU/hr; this should be changed to <u>183 MMBTU/hr</u>. This boiler has never been successfully operated above 13.3 MW, which corresponds with 183 MMBTU/hr.</p>	<p>The change will be made.</p>

Inventories (Subject Item Inventory Table)	The maximum operating rate of the hydrochloric acid tank (T-1) is identified as 500 gallons per day; this should be changed to <u>500 gallons</u> (the maximum amount stored at any given time in this tank – not a daily throughput). The normal operating rate of 750 gallons per year is accurate, as this is the annual throughput of HCl in this tank.	Per LDEQ policy, the maximum operating rate and emissions rates have been removed. Thus, this comment does not need to be addressed.
Specific Requirement #7 (page 1 of 7)	Per phone conversation with permit writer, the requirement to conduct Method 5 - Particulate Matter testing should be removed from this stack testing requirement. This facility, through this permit renewal, has a proposed permitted emission rate of 16.67 ton/year PM10 (lower than the LDEQ 25 ton/yr threshold for requiring PM10 periodic monitoring).	The change will be made.